

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP,

Defendant.

No. 22 Civ. 10016 (LAK)

DECLARATION OF ROBERTA A. KAPLAN IN
SUPPORT OF PLAINTIFF E. JEAN CARROLL'S
MOTION TO EXCUSE JUROR NO. 77

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and am admitted to appear before this Court. I am a partner in the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff E. Jean Carroll in the above-captioned action.

2. I respectfully submit this declaration in support of Carroll's motion to excuse Juror No. 77 for cause.

3. Attached hereto as **Exhibit A** is a true list of all videos created by Tim Pool and posted on YouTube on his Timcast IRL channel in the past six months.

Dated: New York, New York
April 30, 2023



Roberta A. Kaplan